

**IN THE UNITED STATES DISTRICT COURT
FOR SOUTH DAKOTA**

RELIANCE TELEPHONE OF GRAND
FORKS INCORPORATED,
a North Dakota corporation,

and

RELIANCE SYSTEMS INC.,
a Nevada corporation,

Plaintiffs,

v.

YANKTON COUNTY, SOUTH DAKOTA,

and

NETWORK COMMUNICATIONS
INTERNATIONAL CORP.,
a Texas corporation,

Defendants.

Civil No. 4:24-cv-04098-ECS

**PLAINTIFF RELIANCE
SYSTEMS INC.'S
OBJECTIONS TO
DEFENDANT NETWORK
COMMUNICATIONS
INTERNATIONAL CORP.'S
RULE 30(b)(6) NOTICE OF
DEPOSITION TOPICS**

Pursuant to Federal Rule of Civil Procedure 30(b)(6), Plaintiff Reliance Systems Inc. ("Reliance Systems"), through its attorneys, hereby objects to the Deposition Topics ("Topics") listed in Defendant Network Communications International Corp.'s ("NCIC") Notice of Rule 30(b)(6) Deposition Topics, dated June 13, 2025, as follows:

OBJECTIONS

TOPIC 9: Gross profits and net profits made by Reliance Systems in 2020, 2021, 2022, and 2023 under the agreement with Yankton County.

OBJECTION: Reliance Systems objects to this Topic on the grounds that it is vague and ambiguous because the term “profit margin” is not defined and goes beyond the damages suffered as a result of the wrongful conduct of NCIC in this action.

TOPIC 10: Reliance Systems’ profit margin in 2020, 2021, 2022, and 2023 under the agreement with Yankton County.

OBJECTION: Reliance Systems objects to this Topic on the grounds that it is vague and ambiguous because the term “expenses paid” is not defined and goes beyond the damages suffered as a result of the wrongful conduct of NCIC in this action.

TOPIC 11: Expenses paid by Reliance Systems in 2020, 2021, 2022, and 2023 under the agreement with Yankton County.

OBJECTION: Reliance Systems objects to this Topic on the grounds that it is vague and ambiguous because the term “expenses” is not defined and to the extent it purports to seek information about “expenses” generally and goes beyond the damages suffered as a result of the wrongful conduct of NCIC in this action.

TOPIC 12: Reliance Systems’ expenses in 2020, 2021, 2022, 2023, 2024, and 2025.

OBJECTION: Reliance Systems objects to this Topic on the grounds that it is vague and ambiguous because the term “gross revenue” is not defined and to the extent it purports to seek information about “gross revenues” generally and goes beyond the damages suffered as a result of the wrongful conduct of NCIC in this action.

TOPIC 13: Reliance Systems’ gross revenues in 2020, 2021, 2022, 2023, 2024, and 2025.

OBJECTION: Reliance Systems objects to this Topic on the grounds that it is vague and ambiguous in that the term “net revenues” is not defined and to the extent it purports to seek

information about “net revenues” generally and goes beyond the damages suffered as a result of the wrongful conduct of NCIC in this action.

TOPIC 14: Reliance Systems’ net revenues in 2020, 2021, 2022, 2023, 2024, and 2025.

OBJECTION: Reliance Systems objects to this Topic on the grounds that it is vague and ambiguous in that the term “profit and loss statements” is not defined and to the extent it purports to seek information about “profit and loss statements” generally or goes beyond those relevant to Reliance Systems’ damages arising as a result the wrongful conduct of NCIC in this action.

TOPIC 15: Reliance Systems’ profit and loss statements in 2020, 2021, 2022, 2024 and 2025.

OBJECTION: Reliance Systems objects to this Topic on the grounds that it is vague and ambiguous in that the term “profit and loss statements” is not defined and to the extent it purports to seek information about “profit and loss statements” generally or beyond those relevant to Reliance Systems’ damages arising as a result of NCIC’s wrongful conduct as alleged in this action.

TOPIC 16: Identity of the individuals and/or entities who perform Reliance Systems’ bookkeeping, accounting, and tax preparation services.

OBJECTION: Reliance Systems objects to this Topic on the grounds that it is vague and ambiguous in that the terms “bookkeeping, accounting, and tax preparation services” are not defined. Reliance Systems objects to this Topic on the ground that it seeks information not relevant to the issues in this action contrary to the scope of discovery permitted under Fed. R. Civ. P. 26. Reliance Systems further objects to this Topic on the ground that it is harassing and seeks information regarding individuals or firms that is not relevant to any of the issues in this action, contrary to the scope of discovery permitted by Fed. R. Civ. P. 26.

TOPIC 22: Facts supporting Reliance Systems’ claim for damages against Network Communications International Corp. and the calculations thereof.

OBJECTION: Reliance Systems objects to this Topic on the ground that it seeks information that is the subject of an expert report and therefore is not available as a topic for a Rule 30(b)(6) deposition.

Dated: June 16, 2025.

/s/Alan M. Anderson
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*Attorneys for Plaintiff Reliance Telephone of
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Systems Inc.*

Certificate of Service

The undersigned hereby certifies that on this 16th day of June 2025, they caused the foregoing document to be served upon counsel of record for Defendant Yankton County.

Dated: June 16, 2025.

/s/Alan M. Anderson